



Alexander W. Moore
Deputy General Counsel

125 High Street
Oliver Tower – 7th Floor
Boston, MA 02110
alexander.w.moore@verizon.com
O 617.743.2265
F 617.342.8869

August 11, 2016

Sara Clark, Secretary
Department of Telecommunications and Cable
Commonwealth of Massachusetts
1000 Washington Street, Suite 820
Boston, MA 02118-6500

**Re: D.T.C. No. 03-50 -- Performance Assurance Plan –
Service Waiver Request**

Dear Secretary Clark:

Enclosed for filing in the above docket is the Petition of Verizon New England Inc. To Waive Bill Credits Under The Performance Assurance Plan for June 2016. Verizon MA has served this Petition on the parties to the above docket and those CLECs for whom its records reflect a financial interest in the June 2016 PAP results. (The confidential version of Exhibit 1 to the Petition, which contains proprietary CLEC information, was not served on the parties and is being filed only with the Director of the Competition Division.)

Under Appendix C to the PAP, at 40, CLECs have 10 days to serve and file any replies to this Petition.

Thank you for your attention to this matter.

Sincerely,

Alexander W. Moore

Enclosures

cc: Lindsay DeRoche, Director
Service List (electronic copies only)

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Performance Assurance Plan

)
)
)
D.T.E. 03-50

**PETITION OF VERIZON NEW ENGLAND INC. TO WAIVE BILL CREDITS
UNDER THE PERFORMANCE ASSURANCE PLAN FOR JUNE 2016**

Verizon New England Inc., d/b/a Verizon Massachusetts (“Verizon MA”) hereby requests that the Department of Telecommunications and Cable (“Department”) waive the bill credits that would otherwise be due to Competitive Local Exchange Carriers (“CLECs”) under the Performance Assurance Plan (“PAP”) on account of Verizon MA’s inability to meet the Benchmark standard for one metric in the PAP in June of 2016. Verizon MA’s ability to meet that metric, OR-1-12-5020 (MOE – Trunks, % On Time FOC – Interconnect Trunks), was negatively affected by an extraordinary event beyond its control. Namely, on April 13, 2016, the International Brotherhood of Electrical Workers (“IBEW”) and the Communications Workers of America (“CWA,” and collectively, “the Unions”) called a general strike against Verizon MA and affiliated operating telephone companies (collectively “Verizon”), and Verizon’s unionized workers (the “Associates”) walked off their jobs for 50 days, until June 1, 2016 (the “Work Stoppage”).¹

¹ The Work Stoppage affected Verizon’s operations in Connecticut, Delaware, the District of Columbia, Maryland, Massachusetts, New Jersey, New York, Pennsylvania, Rhode Island and Virginia.

The PAP provides that Verizon MA may request a waiver of service results due to events that are beyond its control, including work stoppages, as follows:

The third ground for filing Waivers relates to situations beyond Verizon's control that negatively affect its ability to satisfy only those measures with Benchmark standards. The performance requirements dictated by Benchmark standards establish the quality of service under normal operating conditions, and do not necessarily establish the level of performance to be achieved during periods of emergency, catastrophe, natural disaster, severe storms, work stoppage, or other events beyond Verizon's control.²

The Work Stoppage satisfies these requirements. It was an extraordinary event beyond Verizon MA's control, and despite reasonable and substantial efforts by the Company to insure business continuity and to minimize the impact of the Work Stoppage on its operations, and in particular on its retail and wholesale customers, the Work Stoppage prevented Verizon MA from meeting one of the 80 PAP Benchmark metrics in June of 2016.³ The resulting \$32,433 in CLEC bill credits for June⁴ should be waived. Indeed, the Department allowed Verizon MA to waive bill credits in similar circumstances following a shorter work stoppage in 2011. *See Petition of Verizon New England Inc. to Waive Certain Service Results Measured Under The Performance Assurance Plan for August 2011*, D.T.C. No. 03-50, Order on Petition dated November 21, 2011

² See PAP, Appendix C, at 39-40.

³ The Work Stoppage also prevented Verizon MA from meeting certain PAP metrics in April and May of 2016. *See Petition of Verizon New England Inc. to Waive Certain Service Quality Results Measured Under the Performance Assurance Plan for April 2016*, filed on June 14, 2016 and *Petition of Verizon New England Inc. to Waive Bill Credits Under the Performance Assurance Plan for May 2016*, filed on July 14, 2016.

⁴ See Performance Assurance Plan – June 2016 Monthly Report, filed on July 25, 2016, attached hereto as Exhibit 1. This exhibit contains both the Public (aggregate) and Confidential (CLEC-specific) reports.

(“2011 Order”).⁵ Other state commissions have also granted bill credit waivers in these circumstances.⁶

For the reasons set forth below, the Department should grant the petition and waive the bill credits shown on the monthly PAP report for June of 2016.

I. FACTUAL BACKGROUND

Verizon and the Unions had held meetings to discuss key issues many months before the then-current contracts were scheduled to expire on August 1, 2015. Formal negotiations began the week of June 22, 2015. The issues involved in these negotiations were many and complex. Verizon made numerous comprehensive proposals and took part in hundreds of meetings with Union officials during the negotiations. When the contracts expired, the Union employees initially worked without a contract. On April 11, 2016, however, the Unions announced their plan to strike in two days. On April 11-12, 2016, the Federal Mediation & Conciliation Service

⁵ The Department specified in the 2011 Order that Verizon MA should not “normalize” the underlying data but must “leave the unaltered August 2011 data and reports intact on its [WISE] website, and will omit the August 2011 data in its calculation of the Doubling Provision under the PAP.” Verizon MA proposes the same treatment for the June 2016 data.

⁶ Two commissions have recently allowed Verizon’s petitions for relief from the PAP for April, 2016, on account of the Work Stoppage. *See* District of Columbia Public Service Commission, *Formal Case No. 990, In the Matter of Development of Local Exchange Carrier Quality of Service Standards for the District*, Order dated 18268 dated July 14, 2016; Virginia State Corporation Commission, Case No. PUC-2001-00226, *Order on Petition*, Document 160740182, July 25, 2016. The New York Public Service Commission has held under both the current PAP and an earlier version of the PAP that a work stoppage by Verizon’s Associates qualifies as a “situation[] beyond Verizon’s control” that entitles Verizon to relief from bill credits for the affected Benchmark metrics. *See* Case 99-C-0949 - Petition of Bell Atlantic-New York for Approval of a Performance Assurance Plan and Change Control Assurance Plan, filed in C 97-C-0271, *Order Granting Waiver Request for August 2011 Service Quality* (Issued and Effective May 3, 2012); *Order Granting in Part and Denying in Part Requests for Waivers of Service Quality Targets* (Issued and Effective June 7, 2001).

offered to step in and mediate negotiations. Verizon agreed, but the leaders of the Unions rejected the offer. The work stoppage officially commenced at 6:00 a.m. on April 13, 2016.

In response, Verizon immediately executed its emergency work stoppage plan. Verizon had been planning for a potential work stoppage for well over a year before the contracts expired. Managers across the nation (except those who were designated as essential to corporate operations) were given Emergency Work Assignments (EWAs) by the Company's Business Continuity Planning (BCP) team and participated in training courses for their respective assignments. Managers from various Verizon business units, among them Enterprise (including the former MCI business units), Corporate Finance, HR, and IT from states as far away as California, Illinois, Colorado and Texas were given EWAs. Managers were assigned to both retail and wholesale functions.

Management employees began to report to their emergency work assignments on Wednesday, April 13, 2016, and were assigned to 12-hour shifts, seven days a week. Verizon assigned every available manager to an emergency work assignment, including assignments at the National Market Center ("NMC"), Regional CLEC Maintenance Center ("RCMC") and Regional CLEC Coordination Center ("RCCC"), which support Verizon's wholesale operations. Of necessity, the work force on duty during the Work Stoppage was dedicated to assuring that existing customers continued to receive the best service possible, which meant that maintenance and repair tasks took precedence over any installation work.

Verizon continued to seek resolution with the Unions during the Work Stoppage. As the strike progressed with no resolution in sight, however, Verizon significantly scaled up its contingency workforce by adding contractors, expanding outsourced call center resources, assigning additional managers to EWAs and hiring new temporary workers. Thousands of these

resources were trained and deployed. When all was said and done, Verizon MA was able to mobilize a force of approximately 1,800 managers to perform work usually handled by approximately 4,400 striking workers in Massachusetts. This does not include people working remotely in Florida, North Carolina, Oklahoma and Texas.

The management employees deployed during the Work Stoppage performed their duties under difficult conditions, including delays caused by disruptive actions by striking workers. In addition, approximately 20 reported incidents of sabotage caused losses of service in Massachusetts during the Work Stoppage, contributing to the already heavy maintenance workload on the management employees.⁷

On May 27, 2016, Verizon and the Unions reached an agreement in principle on new contracts, and the Associates returned to work on June 1, 2016. As part of that agreement, the Unions agreed to lift for two weeks restrictions on the number of hours that Verizon MA could have Associates work, in order to help address the backlog of order processing and repair and installation work that had developed during the Work Stoppage.

II. VERIZON MA IS ENTITLED TO WAIVE ITS PERFORMANCE AND RESULTING BILL CREDITS ON ONE PAP METRIC FOR JUNE, 2016, DUE TO THE WORK STOPPAGE.

The PAP provides that:

... C2C service quality data may be influenced by factors beyond Verizon's control, [and] Verizon may file Exception or Waiver

⁷ Verizon took a number of steps to try to reduce the incidents of harassment and sabotage during the work stoppage. It employed additional security personnel, provided escorts for managers assigned to outside plant projects, worked with the local police departments, and offered rewards of up to \$10,000 to individuals who reported acts of sabotage.

petitions with the Department seeking to have the monthly service quality results modified on three generic grounds.

...

The third ground for filing Waivers relates to situations beyond Verizon's control that negatively affect its ability to satisfy only those measures with Benchmark standards. The performance requirements dictated by Benchmark standards establish the quality of service under normal operating conditions, and do not necessarily establish the level of performance to be achieved during periods of emergency, catastrophe, natural disaster, severe storms, work stoppage, or other events beyond Verizon's control.⁸

A work stoppage of 50 days is without question an event beyond Verizon MA's control "that negatively affect its ability to satisfy ... measures with Benchmark standards." Despite its best efforts, Verizon MA could not resolve the outstanding differences with the Unions through ten months of negotiations, and its unionized workers chose to strike. Verizon MA had prepared diligently for a possible strike, and it worked long and hard during the Work Stoppage both to resolve the dispute and, at the same time, to perform the functions of the striking workers and provide the best possible service to as many customers as possible under the circumstances.

The PAP explicitly provides that work stoppages are events beyond Verizon's control that entitle it to waive certain performance results, and the Department has recognized such as well. As noted above, the Department granted Verizon MA a waiver of bill credits after the August 2011 work stoppage.⁹ Thus, Verizon MA is entitled to waive the bill credits for metrics that it could not satisfy as a result of the 2016 Work Stoppage.

⁸ PAP, Appendix C, at 38, 39.

⁹ See 2011 Order, at 8.

Verizon MA met the service quality standards for 79 of the 80 Benchmark metrics in June, immediately following the Work Stoppage, but despite its best efforts, it was unable to satisfy the standard for OR-1-12-5020 due to the Work Stoppage. That metric measures the timeliness of Verizon MA's provision of firm order confirmations (FOCs) to CLECs. It is handled manually by Verizon representatives. As noted, Verizon MA allocated managers to all functions including the wholesale functions in order to provide the best service possible during the Work Stoppage. Even with this extraordinary effort, however, Verizon MA simply did not have enough manpower during the Work Stoppage to fully staff its centers to handle in its normal manner the volume of orders being received.¹⁰

Verizon MA provided the CLECs with excellent service on OR-1-12-5020 prior to the Work Stoppage. As can be seen from Exhibit 2, Verizon MA exceeded the 95% service standard for this metric in every month but one in the year preceding the Work Stoppage,¹¹ demonstrating that it would have met the standard in June as well had there not been a Work Stoppage.

In summary, while Verizon MA assigned a large body of management employees to the jobs ordinarily handled by the striking workers, Verizon MA's available work force was only a fraction of the size of its usual work force, and it was simply impossible for Verizon to meet the standards for these metrics. Moreover, while Verizon MA managers had been trained to perform

¹⁰ Verizon MA missed OR-1-12-5020 in June due to its failure to issue timely FOCs for just four orders, all of which were submitted by a single CLEC during the Work Stoppage and were completed by Verizon MA in June. They fall into the June report because the PAP requires orders to be accounted for in the month in which they are completed, not the month in which they are received.

¹¹ Verizon MA did not meet the 95% standard for OR-1-12-5020 in September of 2015. This was not scored as a miss of the Benchmark, however, due to the allowance in the PAP for missing a single transaction in low volume situations. See PAP at 36-37.

their work stoppage jobs, most of them, especially early in the Work Stoppage, could not perform their jobs as quickly as the striking workers who ordinarily would perform these jobs. Verizon MA took all reasonable, precautionary steps to mitigate the impact of the work stoppage on its service quality and to assure that its wholesale and retail customers received the best service quality possible. Clearly, the work stoppage was an event beyond Verizon MA's control, and Verizon MA was unable to satisfy the Benchmark standard for OR-1-12-5020 under these circumstances in the month immediately after the Work Stoppage ended. Thus, the Department should grant the requested waiver for this metric.

III. DESPITE THE EXTRAORDINARY WORK STOPPAGE EVENT, VERIZON CONTINUED TO PROVIDE PARITY SERVICE TO CLECS.

The PAP provides that any service waiver for events beyond Verizon MA's control must include "an analysis of the extent to which the parity measures (retail and wholesale) were affected by the subject event. . . ." PAP at 40. This provision enables the Department to evaluate whether Verizon MA unfairly discriminated against wholesale customers during a work stoppage or other waivable event.

An analysis of the June 2016 PAP data shows that Verizon MA met the standards for 88 of the 92 parity measures in the PAP, missing only four: MR-3-02-3342 (% Missed Repair Appointment – Central Office – UNE 2W xDSL Loops), MR-4-03-3342 (Mean Time to Repair – Central Office Trouble – UNE 2W xDSL Loops), MR-5-01-3112 (% Repeat Reports within 30 days – UNE-Loop) and MR-5-01-3342 (% Repeat Reports within 30 days – UNE 2W xDSL Loops). *See* Exhibit 1, column 1. Not only did CLECs generally receive parity service in June, but Verizon MA's performance that month is consistent with its performance in prior, business-

as-usual months. For example, Verizon MA missed three parity metrics in March, 2016, the month before the Work Stoppage began.¹² Thus, missing four metrics in June (and zero in April and two in May) immediately following a lengthy Work Stoppage shows no intent by Verizon MA to discriminate against its wholesale customers.

Moreover, the sample size of wholesale observations for the metrics at issue was small. There were only 15 wholesale observations for each of MR-3-02-3342 and MR-4-03-3342 for the month, of which Verizon MA missed five.¹³ In each of those five cases, the CLECs had provided Verizon MA with inaccurate information about the location of the problem (inside the central office versus in the outside plant), which unduly delayed the repairs. For MR-5-01-3112, there were only 353 wholesale observations with 88 repeat troubles in June, as opposed to 11,341 retail observations with 2,311 repeats. Likewise, there were only 50 wholesale observations with 20 repeat troubles for MR-5-01-3342, as opposed to 11,422 retail observations with 2,327 repeats. Due to the small wholesale sample sizes for these metrics and the great difference in the number of observations recorded between wholesale and retail, it does not take much deviation in performance on the wholesale side for Verizon MA to miss these metrics.

Accordingly, these parity misses do not demonstrate unfair discrimination against wholesale customers. To the contrary, the data indicates that Verizon MA strove to maintain parity for the numerous wholesale services that the parity measures monitor and was largely successful in doing so.

¹² See Performance Assurance Plan – March 2016 Monthly Report, filed on April 25, 2016.

¹³ These metrics measure different aspects of the same set of orders, which is why they share the same number of observations.


IV. CONCLUSION

For the foregoing reasons, the Department should grant this Petition and allow Verizon MA to waive the bill credits arising from its service performance results on OR-1-12-5020 in June, 2016.

Respectfully submitted,

VERIZON NEW ENGLAND INC., d/b/a
VERIZON MASSACHUSETTS

By its attorney

A handwritten signature in black ink, appearing to read "Alex Moore", is written over a horizontal line.

Alexander W. Moore
125 High Street
Oliver Tower – 7th Floor
Boston, MA 02110
(617) 743-2265

Dated: August 11, 2016



Patricia Eagan
Manager
State Government Affairs

125 High Street, 7015
Boston, MA 02110

Phone 617 743-4649
Fax 617 743-8881

July 25, 2016

By Overnight Delivery

Sara Clark, Secretary
Department of Telecommunications and Cable
Commonwealth of Massachusetts
1000 Washington Street, Suite 820
Boston, MA 02118

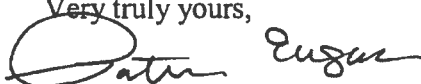
Re: D.T.E. 03-50

Dear Secretary Clark:

In accordance with the Department's March 29, 2007 Letter Order in this proceeding, please find enclosed copies of the June 2016 Reports under the 2007 Performance Assurance Plan (the "2007 PAP"). The 2007 PAP became operational on July 1, 2007.

A proprietary version of the PAP reports containing carrier-specific performance and bill credit calculations (which are used to allocate the credits among eligible CLECs), are being filed with the Department under separate cover.¹ The separate filing contains carrier-specific data and should be treated confidentially by the Department.

Thank you for your assistance in this matter.

Very truly yours,

Patricia Eagan

Enclosures

cc: Lindsay DeRoche
Kerri DeYoung Phillips

¹ Please note that due to the impact of the work stoppage which began on April 13, 2016 on Verizon's operations in Massachusetts, Verizon may file a waiver request with the Department within the timeframe provided for in the 2007 PAP.

June-16

Performance Assurance Plan - Verizon MA

Version 4.0

Section	Mode	Weighted Score	Market Adjustment
MOE	Loop	-0.0636	\$0
MOE	Resale	-0.0622	\$0
MOE	Trunks	-0.0714	\$0
MOE	Total		\$0
Critical Measure	Loop		\$0
Critical Measure	Resale		\$0
Critical Measure	Trunks		\$32,433
Critical Measure	Specials		\$0
Critical Measure	Other		\$0
Critical Measure	Total		\$32,433
Individual Rule	Total		\$0
All	Grand Total		\$32,433

Performance Assurance Plan - Verizon MA

Version 4.0

Blank Stat Score = Insufficient activity or no activity to perform a statistical test

Perf. Score	Wgt	Wgt Score	Metric #	Metric Description	Product	VZ Perf.	CLEC Perf.	VZ Obs	CLEC Obs	VZ Std Dev	Difference or Stat Score	Bill Credit
-5	330	-0.0636		Loop Based Mode of Entry Totals								\$ -
0	2	0.0000	PO-1-01-6020	Average Response Time - Customer Service Record (CSR)	EDI	0 10	3 30		207		3 2043	
0	2	0.0000	PO-1-01-6030	Average Response Time - Customer Service Record (CSR)	CORBA	0 10			0			
0	5	0.0000	PO-1-01-6050	Average Response Time - Customer Service Record (CSR)	WEB GUI/LS/W	0 10	1 09		741		0 9851	
0	2	0.0000	PO-1-03-6020	Average Response Time - Address Validation	EDI	2 08	4 03		1,503		1.9510	
0	2	0.0000	PO-1-03-6030	Average Response Time - Address Validation	CORBA	2 08			0			
0	5	0.0000	PO-1-03-6050	Average Response Time - Address Validation	WEB GUI/LS/W	2 08	2 24		462		0.1606	
0	2	0.0000	PO-1-06-6020	Average Response Time - Mechanized Loop Qualification - xDSL	EDI	9 22	4 43		710		-4 7902	
0	2	0.0000	PO-1-06-6050	Average Response Time - Mechanized Loop Qualification - xDSL	WEB GUI/LS/W	9 22	2 02		1		-7.2002	
0	5	0.0000	PO-2-02-6010	OSS Interface Availability - Prime Time	WPTS		99.98					
0	5	0.0000	PO-2-02-6020	OSS Interface Availability - Prime Time	EDI		100.00					
0	5	0.0000	PO-2-02-6030	OSS Interface Availability - Prime Time	CORBA		100.00					
0	5	0.0000	PO-2-02-6080	OSS Interface Availability - Prime Time	Web GUI		100.00					
-1	2	-0.0061	PO-8-01-6000	% On Time - Manual Loop Qualification	Systems Metrics		33.33		3			
0	10	0.0000	OR-1-02-3331	% On Time LSRC - Flow-through	UNE-L/Pre-qual Comp/LNP		99.54		10,893			
0	5	0.0000	OR-1-04-3331	% On Time LSRC/ASRC - No Facil Chk (Electr No Flow-through)	UNE-L/Pre-qual Comp/LNP		99.37		788			
0	5	0.0000	OR-1-06-3331	% On Time LSRC/ASRC - Facil Chk (Electr No Flow-through)	UNE-L/Pre-qual Comp/LNP		99.50		200			
0	5	0.0000	OR-2-02-3331	% On Time LSR Reject - Flow-through	UNE-L/Pre-qual Comp/LNP		99.76		2,450			
0	5	0.0000	OR-2-04-3331	% On Time LSR/ASR Rej - No Facil Chk (Electr No Flow-through)	UNE-L/Pre-qual Comp/LNP		99.65		283			
0	2	0.0000	OR-2-04-3341	% On Time LSR/ASR Rej - No Facil Chk (Electr No Flow-through)	UNE 2W Digital				0			
0	2	0.0000	OR-2-04-3342	% On Time LSR/ASR Rej - No Facil Chk (Electr No Flow-through)	UNE 2W xDSL Loops		100.00		3			
0	2	0.0000	OR-2-06-3331	% On Time LSR/ASR Rej - Facil Chk (Electr No Flow-through)	UNE-L/Pre-qual Comp/LNP		100.00		53			
0	2	0.0000	OR-2-06-3341	% On Time LSR/ASR Rej - Facil Chk (Electr No Flow-through)	UNE 2W Digital				0			
0	5	0.0000	OR-4-16-1000	% Provisioning Comp. Notifiers sent > 1 Business Day	Resale/UNE (EDI)		99.15		8 162			
0	5	0.0000	OR-5-03-3112	% Flow Through Achieved	UNE-L		95.40		544			
0	5	0.0000	OR-6-03-3331	% Accuracy - LSRC	UNE-L/Comp/LNP		0.00		1 140			
0	5	0.0000	PR-3-10-3342	% Completed in six (6) Days - one (1) to five (5) Lines - Total	UNE 2W xDSL Loops		87.50		8			
0	10	0.0000	PR-4-02-3112	Average Delay Days - Total	UNE-L	13.27	27.50	391	2	11.32		
0	2	0.0000	PR-4-02-3341	Average Delay Days - Total	UNE 2W Digital	26.17		12	0	16.41		
0	5	0.0000	PR-4-02-3342	Average Delay Days - Total	UNE 2W xDSL Loops	10.00	35.00	1	5	0.00		
0	5	0.0000	PR-4-04-3113	% Missed Appointment - Verizon - Dispatch	UNE-L New	18.06	2.63	1,883	38		3 2638	
0	2	0.0000	PR-4-04-1341	% Missed Appointment - Verizon - Dispatch	Resale/UNE 2W Digital	21.82		55	0			
0	2	0.0000	PR-4-05-3341	% Missed Appointment - Verizon - No Dispatch	UNE 2W Digital	0.00		12	0			
0	2	0.0000	PR-4-14-3342	% Completed On Time - 2-Wire xDSL	UNE 2W xDSL Loops		94.74		19			
0	5	0.0000	PR-5-01-3112	% Missed Appointment - Verizon - Facilities	UNE-L	1.49	0.00	1,883	38		5 0000	
0	5	0.0000	PR-5-02-3112	% Orders Held for Facilities > 15 Days	UNE-L	0.80	0.00	1,883	38		5 0000	
0	10	0.0000	PR-6-01-3113	% Installation Troubles reported within 30 Days	UNE-L New	4.54	1.87	4,777	107		1 7182	
0	2	0.0000	PR-6-01-3341	% Installation Troubles reported within 30 Days	UNE 2W Digital	4.54		4,777	0			
0	10	0.0000	PR-6-01-3342	% Installation Troubles reported within 30 Days	UNE 2W xDSL Loops	4.54	3.53	4,777	85		0 6874	
0	20	0.0000	PR-6-02-3520	% Installation Troubles reported within seven (7) Days	UNE-L Basic HC		0.00		28			
0	10	0.0000	PR-6-02-3523	% Installation Troubles reported within seven (7) Days	UNE-L Large Job HC				0			
0	2	0.0000	PR-8-01-3341	Percent Open Orders in a Hold Status > 30 Days	UNE 2W Digital	1.49		67	0			
0	5	0.0000	PR-8-01-3342	Percent Open Orders in a Hold Status > 30 Days	UNE 2W xDSL Loops	0.00	0.00	12	32		5 0000	
0	20	0.0000	PR-9-01-3520	% On Time Performance - Hot Cut	UNE-L Basic HC		100.00		21			
0	10	0.0000	PR-9-01-3523	% On Time Performance - Hot Cut	UNE-L Large Job HC				0			
0	10	0.0000	PR-9-08-3533	Average Duration of Hot Cut Installation Troubles	UNE-L Total HC	35.85		229	0	32.82		
0	2	0.0000	MR-1-01-6050	Average Response Time - Create Trouble	LSI-TA	5.97	2.63		272		-3 3345	
0	10	0.0000	MR-3-01-3112	% Missed Repair Appointment - Loop	UNE-L	22.65	24.56	10,695	338		-0.8050	
0	2	0.0000	MR-3-01-3341	% Missed Repair Appointment - Loop	UNE 2W Digital	22.70		10,763	0			
0	5	0.0000	MR-3-01-3342	% Missed Repair Appointment - Loop	UNE 2W xDSL Loops	22.70	22.86	10,763	35		0.1429	
0	10	0.0000	MR-3-02-3112	% Missed Repair Appointment - Central Office	UNE-L	11.33	100.00	203	2			
0	2	0.0000	MR-3-02-3341	% Missed Repair Appointment - Central Office	UNE 2W Digital	11.48		209	0			
-1	5	-0.0152	MR-3-02-3342	% Missed Repair Appointment - Central Office	UNE 2W xDSL Loops	11.48	33.33	209	15		-1.8755	
0	5	0.0000	MR-4-02-3112	Mean Time To Repair - Loop Trouble	UNE-L	56.25	45.19	10,695	338	80.32	1 6451	
0	2	0.0000	MR-4-02-3341	Mean Time To Repair - Loop Trouble	UNE 2W Digital	56.15		10,763	0	80.12		
0	2	0.0000	MR-4-02-3342	Mean Time To Repair - Loop Trouble	UNE 2W xDSL Loops	56.15	46.69	10,763	35	80.12	0 6503	
0	5	0.0000	MR-4-03-3112	Mean Time To Repair - Central Office Trouble	UNE-L	20.12	102.18	203	2	43.37		
0	2	0.0000	MR-4-03-3341	Mean Time To Repair - Central Office Trouble	UNE 2W Digital	20.20		209	0	42.96		
-1	2	-0.0061	MR-4-03-3342	Mean Time To Repair - Central Office Trouble	UNE 2W xDSL Loops	20.20	73.25	209	15	42.96	-2.8454	
0	2	0.0000	MR-4-04-3341	% Cleared (all troubles) within 24 Hours	UNE 2W Digital	41.71		10,972	0			
0	2	0.0000	MR-4-04-3342	% Cleared (all troubles) within 24 Hours	UNE 2W xDSL Loops	41.71	48.00	10,972	50		1.0437	
0	5	0.0000	MR-4-07-3112	% Out of Service > 12 Hours	UNE-L	77.18	65.38	8,996	286		4 5222	
0	2	0.0000	MR-4-07-3341	% Out of Service > 12 Hours	UNE 2W Digital	77.11		9,062	0			
0	2	0.0000	MR-4-07-3342	% Out of Service > 12 Hours	UNE 2W xDSL Loops	77.11	82.05	9,062	39		-0.5157	
0	10	0.0000	MR-4-08-3112	% Out of Service > 24 Hours	UNE-L	57.86	41.61	8,996	286		5 0000	
-1	10	-0.0303	MR-5-01-3112	% Repeat Reports within 30 Days	UNE-L	20.38	24.93	11,341	353		-1.9846	
0	2	0.0000	MR-5-01-3341	% Repeat Reports within 30 Days	UNE 2W Digital	20.38		11,422	0			
-1	2	-0.0061	MR-5-01-3342	% Repeat Reports within 30 Days	UNE 2W xDSL Loops	20.38	48.00	11,422	50		-3 0285	

Performance Assurance Plan - Verizon MA

Version 4.0

Blank Stat. Score = Insufficient activity or no activity to perform a statistical test

Perf Score	Wgt	Wgtd Score	Metric #	Metric Description	Product	VZ Perf.	CLEC Perf.	VZ Obs.	CLEC Obs.	VZ Std Dev.	Difference or Stat. Score	Bill Credit
-2	241	-0.0622	MOE-Resale	Resale Mode of Entry Totals								\$ -
0	2	0.0000	PO-1-01-6020	Average Response Time - Customer Service Record (CSR)	EDI	0 10	3 30		207		3.2043	
0	2	0.0000	PO-1-01-6050	Average Response Time - Customer Service Record (CSR)	WEB GUI/LSI/W	0 10	1 09		741		0.9851	
0	2	0.0000	PO-1-03-6020	Average Response Time - Address Validation	EDI	2 08	4 03		1,503		1.9510	
0	2	0.0000	PO-1-03-6050	Average Response Time - Address Validation	WEB GUI/LSI/W	2 08	2 24		462		0.1606	
0	5	0.0000	PO-2-02-6020	QSS Interface Availability - Prime Time	EDI		100 00					
0	5	0.0000	PO-2-02-6050	QSS Interface Availability - Prime Time	Web GUI		100 00					
0	10	0.0000	OR-1-02-2320	% On Time LSRC - Flow-through	Resale POTS/Pre-qual Complx		100 00		88			
0	5	0.0000	OR-1-04-2320	% On Time LSRC/ASRC - No Facil Chk (Electr. No Flow-through)	Resale POTS/Pre-qual Complx		97 73		44			
0	5	0.0000	OR-2-02-2320	% On Time LSR Reject - Flow-through	Resale POTS/Pre-qual Complx		100 00		54			
0	2	0.0000	OR-2-04-2320	% On Time LSR/ASR Rej - No Facil Chk (Electr. No Flow-through)	Resale POTS/Pre-qual Complx		100 00		23			
0	2	0.0000	OR-2-06-2320	% On Time LSR/ASR Rej - Facil Chk (Electr. No Flow-through)	Resale POTS/Pre-qual Complx		100 00		2			
0	5	0.0000	OR-4-16-1000	% Provisioning Comp. Notices sent - 1 Business Day	Resale/UNE (EDI)		99 15		8 162			
-1	10	-0.0415	OR-5-03-2000	% Flow Through Achieved	Resale		93.62		94			
0	10	0.0000	OR-6-03-2000	% Accuracy - LSRC	Resale		0 00		107			
0	5	0.0000	PR-3-01-2100	% Completed in 1 Day - one (1) to five (5) Lines - No Dispatch	Resale POTS	63 38	40 00	7,386	5			
0	15	0.0000	PR-4-02-2100	Average Delay Days - Total	Resale POTS	13 27	11 50	391	4	11 32		
0	10	0.0000	PR-4-04-2100	% Missed Appointment - Verizon - Dispatch	Resale POTS	18 08	19 05	1,883	21		0.1085	
0	20	0.0000	PR-4-05-2100	% Missed Appointment - Verizon - No Dispatch	Resale POTS	0 44	0 00	11,587	29		5.0000	
0	5	0.0000	PR-5-01-2100	% Missed Appointment - Verizon - Facilities	Resale POTS	1 49	4 76	1,883	21		-0.5925	
0	5	0.0000	PR-5-02-2100	% Orders Held for Facilities > 15 Days	Resale POTS	0 80	0 00	1,883	21		5.0000	
0	15	0.0000	PR-6-01-2100	% Installation Troubles reported within 30 Days	Resale POTS	6 73	3 57	15,970	84		1.4545	
0	2	0.0000	MR-1-01-6050	Average Response Time - Create Trouble	LSI-TA	5 97	2 63		272		-3.3345	
0	2	0.0000	MR-1-06-6050	Average Response Time - Test Trouble (POTS Only)	LSI-TA		52.61		384			
0	10	0.0000	MR-3-01-2110	% Missed Repair Appointment - Loop	Resale POTS Bus	28 44	18 46	3,020	65		1.9744	
0	10	0.0000	MR-3-01-2120	% Missed Repair Appointment - Loop	Resale POTS Res	20 24	33 33	7,674	24		-1.3115	
0	10	0.0000	MR-3-02-2110	% Missed Repair Appointment - Central Office	Resale POTS Bus	14 23	0 00	274	1			
0	10	0.0000	MR-3-02-2120	% Missed Repair Appointment - Central Office	Resale POTS Res	13 24	0 00	370	1			
0	6	0.0000	MR-4-02-2110	Mean Time To Repair - Loop Trouble	Resale POTS Bus	31 49	27 78	3,020	65	60 92	0.3848	
0	5	0.0000	MR-4-02-2120	Mean Time To Repair - Loop Trouble	Resale POTS Res	66 00	94 57	7,674	24	84 81	-1.5117	
0	5	0.0000	MR-4-03-2110	Mean Time To Repair - Central Office Trouble	Resale POTS Bus	12 28	24 62	274	1	30 38		
0	5	0.0000	MR-4-03-2120	Mean Time To Repair - Central Office Trouble	Resale POTS Res	25 43	10 13	370	1	67 55		
0	5	0.0000	MR-4-07-2110	% Out of Service > 12 Hours	Resale POTS - Bus	51 87	58 62	2,749	58		-0.8844	
0	5	0.0000	MR-4-07-2120	% Out of Service > 12 Hours	Resale POTS - Res	86 29	80 00	6,501	20		1.1323	
0	5	0.0000	MR-4-08-2110	% Out of Service > 24 Hours	Resale POTS Bus	32 56	29 31	2,749	58		0.6546	
0	5	0.0000	MR-4-08-2120	% Out of Service > 24 Hours	Resale POTS Res	67 19	70 00	6,501	20		-0.0008	
0	10	0.0000	MR-5-01-2100	% Repeat Reports within 30 Days	Resale POTS	20 38	26 37	11,341	91		-1.2693	
-1	5	-0.0207	BI-1-02-1000	% OUF in four (4) Business Days	Resale & UNE		94 83		592 204			
-2	140	-0.0714	MOE-Trunks	Trunks Mode of Entry Totals								\$ -
-2	5	-0.0714	OR-1-12-5020	% On Time FOC	Interconnect Trunks(<=132 Forecast)		82 61		23			
0	10	0.0000	OR-1-13-5000	% On Time Design Layout Record (DLR)	Interconnect Trunks		100 00		3			
0	5	0.0000	OR-1-19-5020	% On Time Response - Request for Inbound Augment Trunks	VZ Inbound Aug Trunks(<=132)				0			
0	5	0.0000	OR-2-12-5020	% On Time Trunk ASR Reject	Interconnect Trunks		100 00		7			
0	20	0.0000	PR-4-07-3540	% On Time Performance - LNP Only	UNE LNP		99 96		2,335			
0	20	0.0000	PR-4-15-5000	% On Time Provisioning - Trunks	Interconnect Trunks		100 00		1,056			
0	5	0.0000	PR-5-01-5000	% Missed Appointment - Verizon - Facilities	Interconnect Trunks	0 00	0 00	1,274	144		5.0000	
0	5	0.0000	PR-5-02-5000	% Orders Held for Facilities > 15 Days	Interconnect Trunks	0 00	0 00	1,274	144		5.0000	
0	10	0.0000	PR-6-01-5000	% Installation Troubles reported within 30 Days	Interconnect Trunks	0 00	0 00	1,274	1,056		5.0000	
0	5	0.0000	PR-8-01-5000	Percent Open Orders in a Hold Status > 30 Days	Interconnect Trunks	5 56	0 00	18	13		5.0000	
0	5	0.0000	MR-4-01-5000	Mean Time To Repair - Total	Interconnect Trunks	36 06	1 90	6	1	54 19		
0	5	0.0000	MR-4-05-5000	% Out of Service > 2 Hours	Interconnect Trunks	75 00	0 00	4	1			
0	5	0.0000	MR-4-06-5000	% Out of Service > 4 Hours	Interconnect Trunks	75 00	0 00	4	1			
0	5	0.0000	MR-4-07-5000	% Out of Service > 12 Hours	Interconnect Trunks	60 00	0 00	4	1			
0	5	0.0000	MR-4-08-5000	% Out of Service > 24 Hours	Interconnect Trunks	50 00	0 00	4	1			
0	10	0.0000	MR-5-01-5000	% Repeat Reports within 30 Days	Interconnect Trunks	0 00	0 00	6	1			
0	5	0.0000	NP-1-03-5000	# of Final Trunk Groups Blocked 2 months	CLEC Trunks		0 00					
0	10	0.0000	NP-1-04-5000	# of Final Trunk Groups Blocked 3 months	CLEC Trunks		0 00					

Performance Assurance Plan - Verizon MA

Version 4.0

Blank Stat. Score = Insufficient activity or no activity to perform a statistical test

Perf. Score	Wgt	Wgt Score	Metric #	Metric Description	Product	VZ Perf	CLEC Perf	VZ Obs	CLEC Obs	VZ Std Dev	Difference or Stat. Score	Bill Credit
			CM-ALL	Critical Measures Totals								\$ 32,433
0	10		OR-1-02-3331	% On Time LSRC - Flow-through	UNE-L/Pre-qual Compl/LNP		99.94		10,893			\$0
0	5		OR-1-04-3331	% On Time LSRC/ASRC - No Facil Chk (Electr. No Flow-through)	UNE-L/Pre-qual Compl/LNP		99.37		768			\$0
0	5		OR-1-06-3331	% On Time LSRC/ASRC - Facil Chk (Electr. No Flow-through)	UNE-L/Pre-qual Compl/LNP		99.50		200			\$0
0	2		PR-4-04-1341	% Missed Appointment - Verizon - Dispatch	Resale/UNE 2W Digital	21.82		55	0			\$0
0	10		PR-4-04-3113	% Missed Appointment - Verizon - Dispatch	UNE-L New	18.06	2.63	1,883	38		3.2638	\$0
0	2		PR-4-14-3342	% Completed On Time - 2-Wire xDSL	UNE 2W xDSL Loops		94.74		19			\$0
0	10		PR-6-01-3113	% Installation Troubles reported within 30 Days	UNE-L New	4.54	1.87	4,777	107		1.7182	\$0
0	2		PR-6-01-3342	% Installation Troubles reported within 30 Days	UNE 2W xDSL Loops	4.54	3.53	4,777	85		0.6674	\$0
0	20		PR-6-02-3520	% Installation Troubles reported within seven (7) Days	UNE-L Basic HC		0.00		28			\$0
0	10		PR-6-02-3523	% Installation Troubles reported within seven (7) Days	UNE-L Large Job HC				0			\$0
0	20		PR-9-01-3520	% On Time Performance - Hot Cut	UNE-L Basic HC		100.00		21			\$0
0	10		PR-9-01-3523	% On Time Performance - Hot Cut	UNE-L Large Job HC				0			\$0
0	2		MR-3-01-3112	% Missed Repair Appointment - Loop	UNE-L	22.55	24.56	10,895	338		-0.8050	\$0
0	2		MR-3-01-3342	% Missed Repair Appointment - Loop	UNE 2W xDSL Loops	22.70	22.86	10,763	35		0.1429	\$0
0	10		MR-4-08-3112	% Out of Service > 24 Hours	UNE-L	57.85	41.61	8,996	286		5.0000	\$0
0	10		OR-1-02-2320	% On Time LSRC - Flow-through	Resale POTS/Pre-qual Compl		100.00		88			\$0
0	5		OR-1-04-2320	% On Time LSRC/ASRC - No Facil Chk (Electr. No Flow-through)	Resale POTS/Pre-qual Compl		97.73		44			\$0
0	10		PR-4-04-2100	% Missed Appointment - Verizon - Dispatch	Resale POTS	18.06	19.05	1,883	21		0.1065	\$0
0	20		PR-4-05-2100	% Missed Appointment - Verizon - No Dispatch	Resale POTS	0.44	0.00	11,587	29		5.0000	\$0
0	15		PR-6-01-2100	% Installation Troubles reported within 30 Days	Resale POTS	6.73	3.57	15,970	84		1.4545	\$0
0	1		MR-3-01-2110	% Missed Repair Appointment - Loop	Resale POTS Bus	28.44	18.46	3,029	65		1.9744	\$0
0	1		MR-3-01-2120	% Missed Repair Appointment - Loop	Resale POTS Res	20.24	33.33	7,674	24		-1.3115	\$0
0	5		MR-4-08-2110	% Out of Service > 24 Hours	Resale POTS Bus	32.56	29.31	2,749	58		0.6546	\$0
0	5		MR-4-08-2120	% Out of Service > 24 Hours	Resale POTS Res	67.19	70.09	6,601	26		-0.0008	\$0
-2	5		OR-1-12-5020	% On Time FDC	Interconnect Trunks(<=192 Forecast)		82.61		23			\$32,433
0	10		OR-1-13-5000	% On Time Design Layout Record (DLR)	Interconnect Trunks		100.00		3			\$0
0	20		PR-4-07-3540	% On Time Performance - LNP Only	UNE LNP		99.96		2,335			\$0
0	20		PR-4-15-5000	% On Time Provisioning - Trunks	Interconnect Trunks		100.00		1,056			\$0
0	10		NP-1-04-5000	# of Final Trunk Groups Blocked 3 months	CLEC Trunks		0.00					\$0
0	2		OR-1-06-3211	% On Time LSRC/ASRC - Facil Chk (Electr. No Flow-through)	UNE/RES Specials DS1		98.87		265			\$0
0	2		OR-2-04-1200	% On Time LSR/ASR Rej - No Facil Chk (Electr. No Flow-through)	UNE/RES Specials		85.71		7			\$0
0	2		OR-2-06-1200	% On Time LSR/ASR Rej - Facil Chk (Electr. No Flow-through)	UNE/RES Specials		98.00		50			\$0
0	2		PR-4-01-1210	% Missed Appointment - Verizon - Total	UNE/RES Specials DS0	8.33	0.00	12	1			\$0
0	2		PR-4-01-1211	% Missed Appointment - Verizon - Total	UNE/RES Specials DS1	24.59	23.86	61	88		0.3017	\$0
0	2		PR-4-01-1213	% Missed Appointment - Verizon - Total	UNE/RES Specials DS3			0	0			\$0
0	2		PR-4-01-3530	% Missed Appointment - Verizon - Total	UNE IOF		0.00	0	5			\$0
0	2		PR-4-02-1200	Average Delay Days - Total	UNE/RES Specials	21.59	10.48	34	21	12.71	3.2332	\$0
0	5		PR-4-02-3530	Average Delay Days - Total	UNE IOF			0	0			\$0
0	5		PR-5-01-1200	% Missed Appointment - Verizon - Facilities	UNE/RES Specials	1.57	0.93	127	168		1.0106	\$0
0	5		PR-5-02-1200	% Orders Held for Facilities > 15 Days	UNE/RES Specials	0.79	0.00	127	168		5.0000	\$0
0	5		PR-6-01-1200	% Installation Troubles reported within 30 Days	UNE/RES Specials	3.61	1.61	166	124		1.4221	\$0
0	2		MR-4-01-1216	Mean Time To Repair - Total	UNE/RES Specials (Non DS0/DS0)	16.46	5.47	294	6	24.25	1.8610	\$0
0	2		MR-4-01-1217	Mean Time To Repair - Total	UNE/RES Specials (DS1/DS3)	10.60	6.45	241	192	11.48	4.5941	\$0
0	2		MR-4-08-1216	% Out of Service > 24 Hours	UNE/RES Specials (Non DS0/DS0)	18.32	0.00	273	4			\$0
0	2		MR-4-08-1217	% Out of Service > 24 Hours	UNE/RES Specials (DS1/DS3)	7.73	1.68	181	179		3.0883	\$0
0	2		PO-2-02-6010	OSS Interface Availability - Prime-Time	WPTS		99.98					\$0
0	5		PO-2-02-6020	OSS Interface Availability - Prime-Time	EDI		100.00					\$0
0	5		PO-2-02-6080	OSS Interface Availability - Prime-Time	Web GUI		100.00					\$0
0	10		PO-4-01-6660	% Change Management Notices Sent on Time	Change Notif./Conf. (Type 3,4,5)				0			\$0
0	25		BI-9-01-1000	% Billing Completeness in Twelve Billing Cycles	Resale/UNE		99.98		3,192,557			\$0

